

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ERIN LLOYD, as SPECIAL ADMINISTRATOR OF
THE ESTATE OF AARON GREENE, deceased

plaintiff

versus

UNITED STATES OF AMERICA

defendants

Case No.: No. 19 C 1953

Judge Norgle

CERTIFICATE OF MERIT

1. That I am a physician duly licensed to practice medicine and currently practice or teach in the specialty of medicine at issue involved in this particular case.
2. That I am knowledgeable in the relevant issues involved in this particular case.
3. That I currently practice or teach, and have practiced or taught within the last six (6) years, in the same area of healthcare medicine that is at issue in this particular action.
4. That I have reviewed the records concerning the medical treatment provided to AARON W. GREEN by Dr. Hawkins.
5. Upon reviewing the aforementioned medical records, it is my opinion that Dr. Hawkins deviated from acceptable standards of medical care in the following manners:
 - a. To summarize briefly, Mr. GREENE had a history of smoking, hypertension and diabetes, - risks associated with coronary artery disease and was seeing Dr. Hawkins several times at her office for almost a year in 2015. At one point Mr. Greene came to her office on 05/07/2015 with a chief complaint of chest pain.
 - b. At the visit on 05/07/2015 Dr. Hawkins, relative to his complaints of chest pain, did not take and record an appropriate history, conduct and record any examination, order necessary tests for his complaints, refer him to a cardiologist, order a stress test or provide him with any medication that would be appropriate for his complaints.

- c. It is my opinion that Dr. Hawkins' failures as described above constituted significant deviations from the standard of care.
- d. As a consequence of Dr. Hawkins' failures, Mr. Greene's atherosclerotic coronary heart disease went undiagnosed and untreated which directly led to him suffering a fatal heart attack.

Therefore, it is my opinion that there is a meritorious claim of medical negligence against the UNITED STATES OF AMERICA as the principal and employer of Dr. Hawkins.

FURTHER AFFIANT SAYETH NOT.

5. Upon reviewing the aforementioned medical records, it is my opinion that Dr.

Hawkins deviated from acceptable standards of medical care in the following manners:

- a. To summarize briefly, Mr. GREENE had a history of smoking, hypertension and diabetes, - risks associated with coronary artery disease and was seeing Dr. Hawkins several times at her office for almost a year in 2015. At one point Mr. Greene came to her office on 05/07/2015 with a chief complaint of chest pain.
- b. At the visit on 05/07/2015 Dr. Hawkins, relative to his complaints of chest pain, did not take and record an appropriate history, consider or order necessary tests including but not limited to labs, EKG, stress test, echocardiogram, consider or refer him to the ER or cardiologist or provide him with any medication that would be appropriate for his complaints.
- c. It is my opinion that Dr. Hawkins' failures as described above constituted significant deviations from the standard of care.
- d. As a consequence of Dr. Hawkins' failures, Mr. Greene's atherosclerotic coronary heart disease went undiagnosed and untreated which directly led to him suffering a fatal heart attack.

Therefore, it is my opinion that there is a meritorious claim of medical negligence against Dr. Hawkins and her practice, D.H. Medical Center in this matter.

FURTHER AFFIANT SAYETH NOT.



Firm I. D. No. 22231

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

ERIN LLOYD, as Special Administrator of
the Estate of AARON GREENE, deceased
Plaintiff

versus

ROCHELLE HAWKINS, M.D. and D.H.
MEDICAL GROUP, S.C.

Defendants

Case No: 18 L 00389

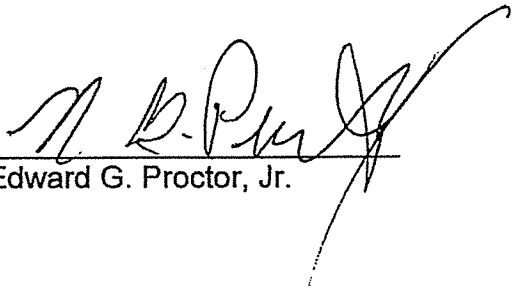
AFFIDAVIT

YOUR AFFIANT, EDWARD G. PROCTOR, JR., attorney for the plaintiff herein,
ERIN LLOYD, as Special Administrator of the Estate of AARON GREENE, deceased
being first duly sworn, deposes and states that:

1. I am the attorney for the Plaintiff herein, ERIN LLOYD, as Special
Administrator of the Estate of AARON GREENE, deceased.
2. I have consulted and reviewed the facts surrounding the treatment of ERIN
LLOYD, as Special Administrator of the Estate of AARON GREENE, deceased, with a
licensed physician who I reasonably believe is knowledgeable in the relevant issues
involved in this particular action.
3. The said reviewing physician practices or has practiced within the last 6 years
or teaches or has taught within the last 6 years in the same area of health care or
medicine that is at issue in this particular action.

4. The said reviewing physician is qualified by experience or has demonstrated competence in the subject of this case and has determined after a review of plaintiff's medical records and other relevant material, that there is a reasonable and meritorious cause for the filing of this action.

5. I have concluded, on the basis of the said review and consultation of the reviewing physician, that there is a reasonable and meritorious cause for the filing of this action.


Edward G. Proctor, Jr.

Subscribed and sworn to
before me this 18th day of April, 2018.


NOTARY PUBLIC

